

EXHIBIT C

GENERAL RELEASE

DISABILITY RIGHTS VERMONT (“Releasor”), for and in consideration of SIXTY THOUSAND Dollars (\$60,000.00), lawful money of the United States, paid by the STATE OF VERMONT (“Releasee”), the receipt and sufficiency of which is hereby acknowledged, and in consideration of agreement by the STATE OF VERMONT to comply with the terms of a Settlement Agreement executed by the parties, does hereby remise, release and forever discharge, and by these presents does for its executors; administrators; successors and assigns remise, release and forever discharge Ken Schatz, DCF Commissioner, and Jay Simons in their official capacities, and the STATE OF VERMONT, the VERMONT DEPARTMENT FOR CHILDREN AND FAMILIES (“DCF”), and any and all State agencies, departments, subdivisions, insurers, successors, assigns and its current and former employees, officers, directors, agents, contractors, adjusters, attorneys, and representatives, in both their official and personal capacities of and from any and all actions, cause and causes of action, suits, debts, damages, judgments, executions, claims and demands whatsoever known or unknown, in law or in equity, including any claims for attorney’s fees or costs, which Releasor ever had, now has, may have, or which it could assert on behalf of its constituents, pursuant to 42 U.S.C. § 10801 et seq., 42 U.S.C. §15001 et seq., 29 U.S.C. §794e; against Ken Schatz, DCF Commissioner, and Jay Simons in their official capacities, and the STATE OF VERMONT, the VERMONT DEPARTMENT FOR CHILDREN AND FAMILIES (“DCF”), and any and all State agencies, departments, subdivisions, insurers, successors, assigns and its current and former employees, officers, directors, agents, contractors, adjusters, attorneys, and representatives, in both their official and personal capacities, upon, or by reason of any matter, cause, or thing whatsoever, from the beginning of the world to the day of the date of this Release and particularly including, but without in any manner limiting the foregoing, all issues and any claim that were or could have been asserted in the following case: *Disability Rights Vermont v. Vermont Department for Children and Families, et al.*, Civil Action No. 5:19-cv-106.

Releasor agrees that there are no collateral or outside agreements of any kind between the parties. It is also understood and agreed that this settlement is the compromise, accord, and satisfaction of disputed claims, and that this Release and any consideration therefore is not to be construed as an admission of liability on the part of the parties released, by whom liability is expressly denied. It is further agreed and understood that this payment and compromise settlement is made to terminate further controversy with respect to all claims that Releasor has asserted or that it might assert against Releasees arising from any matter, cause, or thing whatsoever.

Releasor acknowledges that it has had ample time to consult with its attorneys and others prior to signing this General Release, is competent to sign this General Release, and does so voluntarily and without duress.

IN WITNESS WHEREOF, I have hereunto set my hand and seal this 18th day of March, 2020.

By:

Ed Paquin
ED PAQUIN, Executive Director
Disability Rights Vermont

On this the 18th day of March, 2020, before me personally appeared Ed Paquin, known to me (or satisfactorily proven) to be the person whose name was subscribed to the foregoing Release and acknowledged that he executed the same for the purposes therein contained as his free act and deed.

Lura Hagen
Notary Public
My commission expires: 1-31-21
License No.: 157-0009577